IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

REBECCA CASTILLO, :

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Plaintiff,
Case No. 1:17-cv-01846-JG

v. : Judge James S. Gwin

THINGS REMEMBERED, INC.,

Defendant.

SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER PLAINTIFF'S COMPLAINT OR OTHERWISE PLEAD

Defendant Things Remembered, Inc. moves this Honorable Court for an order granting it a second 30-day extension of time by which to answer Plaintiff's Complaint or otherwise plead – extending the deadline to January 15, 2018. Plaintiff does not oppose this motion for a continuance.

This motion is made in good faith and not for purposes of delay. Plaintiff asserts public accommodations claims relating to Defendant's website. The Parties are engaged in settlement discussions, but need additional time to reach a resolution of the matter, including investigating remediation. Given the nascent stage of this litigation, that the Parties are working towards mutual resolution, and the fact that Plaintiff does not oppose this motion, the Parties will suffer no prejudice by this reasonable extension of time.

Respectfully submitted,

/s/ Amy Ryder Wentz

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Attorney for Defendant THINGS REMEMBERED, INC.

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2017, a copy of the foregoing *Second Unopposed Motion for Extension of Time to Answer Plaintiff's Complaint or Otherwise Plead* was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Amy Ryder Wentz

Amy Ryder Wentz

One of the Attorneys for Defendant THINGS REMEMBERED, INC.

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